United States Environmental Protection Agency EPA New England One Congress Street, Suite 1100 Boston, MA 02114-2023

November 15, 2006

To: J. Kilborn, EPA

H. Inglis, EPA

R. Howell, EPA (w/o attachments)

D. Moore, USACE

K.C. Mitkevicius, USACE

S. Steenstrup, MA DEP (2 copies)

R. Bell, Esquire, MA DEP

S. Peterson, CT DEP

A. Silfer, GE

J. Novotny, GE

J.R. Bieke, Esquire, Shea & Gardner

S. Messur, BBL

D. Young, MA EOEA

K. Munney, US Fish and Wildlife

D. Mauro, META Environmental, Inc.

R. Nasman, The Berkshire Gas Company

Mayor Ruberto, City of Pittsfield

Commissioner of Public Works and Utilities, City of Pittsfield

Public Information Repositories

RE: October Monthly Report

1.5 Mile Reach Removal Action

GE-Pittsfield/Housatonic River Site

Enclosed please find the October 2006 Monthly Report for the 1.5 Mile Reach Removal Action. In accordance with the Consent Decree for the GE-Pittsfield/Housatonic River Site, the United States Environmental Protection Agency (EPA) is performing the 1.5 Mile Reach Removal Action, with General Electric funding a portion of the project through a cost sharing formula.

The EPA has entered into an agreement with the United States Army Corps of Engineers (USACE) to assist in the design and construction of the Removal Action. The USACE subsequently awarded a design-construct contract to Weston Solutions, Inc. (Weston). Weston, with several subcontractors, will be performing the design and construction activities for the 1.5 Mile Reach Removal Action.

If you have any questions, please contact me at (413) 236-0969.

Sincerely,

Dean Tagliaferro

1.5 Mile Reach Removal Action Project Manager

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1. Overview

During October 2006, the Environmental Protection Agency (EPA), the United States Army Corps of Engineers (USACE), the USACE's contractor, Weston Solutions, Inc., and Weston's subcontractors continued restoration activities on the 1.5 Mile Reach Removal Action. The removal of the access roads and final restoration activities on Parcel I8-23-6 were completed. Final restoration activities on Parcel I9-5-13 were completed. Paving of Hathaway Street was completed. Also, fall planting activities at Fred Garner Park and on Parcels I9-4-14 and I9-4-19 were completed. In addition, transfer of non-TSCA materials from the stockpile management areas to an approved off-site facility was performed.

2. Chronological description of tasks performed

Refer to Figure 1 (2 maps) for an orientation of the 1.5 Mile Reach Removal Action.

By the end of September, activities associated with the removal of the access roads on Parcel I8-23-6 were well underway. During the month of October, restoration activities on parcel I8-23-6 were completed. Re-grading and installation of a riprap swale across the access road was completed. Touch up hydro-seeding was performed in areas where the seed was washed away during the heavy rains since the original hydro-seeding efforts. The installation of the guardrail around the drainage swale on Parcel I8-23-6 was completed. The installation of a six-foot green vinyl coated chain link fence and gate at the Hathaway Street entrance to Parcel I8-23-6 was completed. Also, the temporary double gate at the Laundromat entrance to the access road on Parcel I8-23-6 was removed.

GE's contractor removed their temporary access road from Hathaway Street to the drainage swale crossing including the removal of one to three inch layer of native sub-grade materials. EPA contractors used some of the removed road material to construct a new fifteen-foot wide maintenance road (one to three inches thick) from Hathaway Street to the drainage swale crossing.

Activities associated with re-paving of Hathaway Street were completed. The existing asphalt was removed and the subgrade was re-graded. The removed asphalt was transported to an appropriate re-cycling facility and all other miscellaneous debris was transported to Area 64 stockpile management areas. Next, a new two-inch asphalt base course layer was installed. Topsoil was installed along the newly paved road. Then a two-inch asphalt top course layer was installed. Finally the topsoil was raked and seeded.

Final restoration activities of Parcel I9-5-13 were completed. The installation of twenty dark American arborvitaes was completed and the newly restored lawn was hydro-seeded.

Other restoration activities during the month of October included the installation of three lilac bushes on Parcel I7-2-20. Miscellaneous repairs to the front porch on Parcel I8-24-6 were completed. Repairs to a wash out on the riverbank on Parcel I9-2-203 were completed by placing additional black driveway mix and 9-inch riprap along the top of the riverbank. Also, restoration of a small wash out area on the riverbank on Parcel I7-3-7 was completed. This consisted of placement of additional topsoil and seed.

In addition, miscellaneous restoration activities at the Fred Garner Park continued. Installation of pea stone along the paved entrance road to Fred Garner Park was completed. The two 18-inch HDPE drainage pipes were cut at the outfall to match the grade of the riverbank riprap. The installation of "no parking" signs at the guard rail slide gates was completed. Repairs to the temporary security gate to the park were completed. The removal of the temporary site security fencing and the gate are scheduled for spring 2007.

Activities associated with final settlement and conditions monitoring on the commercial properties along the 1.5 mile removal reach were completed.

The survey contractor continued as-built surveys on Parcels I8-23-6 and I9-5-13.

Fall planting activities were completed. Supplemental trees and shrubs in areas that were identified during the summer inspections were planted to meet the 1.5 mile removal reach vegetation density requirements. The installation of trees and shrubs on Parcels I9-4-14 and I9-4-19 were completed. The installation of the larger trees within the downstream sections of Fred Garner Park was completed. All the disturbed areas within the new plantings were hand raked and the eight-foot walking path to the downstream section of the park was york-raked. Hand-seeding of the disturbed areas within the new plantings and hydro-seeding of the eight-foot walking path is scheduled for early November 2006.

The invasive species control and the tree maintenance within the 1.5 mile remediation reaches were completed for the fall 2006 season. Installation, maintenance and re-setting of the tree protective cages were performed.

Other miscellaneous activities performed during the month of October included the decontamination of the bin blocks and the jersey barriers. Maintenance and or the removal of the silt fencing throughout the 1.5 mile remediation area continued. The offsite transportation of the bin blocks and the jersey barriers continued. Also, demobilization of the Area 64 staging areas continued.

The removal of the temporary site security gate at the south end of Cove Street was completed.

The remainder of the dense grade material generated during the removal of access roads on Parcel I8-23-6 and slated for re-use as clean fill were transported from Area 64C south stockpile management area to the Silver Lake construction site. The material will be used by GE's contractor for construction of a staging area at the Silver Lake Capping Pilot Project.

The common fill materials generated during the removal of access roads on Parcel I8-23-6, met the requirements for re-use as clean fill (refer to sample IDs H2-OT000410-0-6G31, H2-OT000421-0-6S13, and H2-OT000422-0-6S13). These materials are stockpiled in Area 64 stockpile management area. EPA informed GE that the common fill material analytical data met the standards for re-use as clean fill and EPA offered the material for re-use. GE agreed to accept this material for future re-use as backfill. The stockpiles were re-shaped, covered with heavy duty tarps and the tarps were secured with bin blocks.

In addition, the stockpile of dense grade material on PEDA property was re-shaped, covered with heavy duty tarps and the tarps were secured with bin blocks.

The non-TSCA materials from the Area 64A stockpile management areas were transported to the Waste Management of New Hampshire-TREE, Rochester, N.H. on October 03, 2006 and October 04, 2006. (See Table 1 for a summary of material transported to the Waste Management of New Hampshire-TREE, Rochester, N.H. during the month of October 2006).

During the month of October 2006, seventeen concrete characterization samples were collected on the jersey barriers and the bin blocks. Two equipment decontamination verification samples were collected. Also, seven additional samples were collected on the topsoil material on Parcel I8-23-6 and at the entrance of Fred Garner Park post-placement. The additional samples were collected due to an elevated Total Petroleum Hydrocarbons (TPH) result that was obtained during the original testing of the topsoil material. The additional samples were analyzed for Extractable Petroleum Hydrocarbons (EPH) to ensure that the material meets the MCP Wave 2 Method 1 S-1&GW-1 Standards. Also, the original topsoil sample that had the elevated TPH result was re-analyzed for EPH. The EPH results are all lower than the MCP Wave 2 Method 1 S-1&GW-1 Standards.

Stockpile management area activities continued throughout the month of October.

3. Sampling/test results received

Table 2 contains the results for the seventeen concrete characterization samples collected on the jersey barriers and the bin blocks. Results for the two equipment decontamination verification samples are presented in Table 3. Data associated with the EPH samples collected on the topsoil (post-placement) are summarized in Table 4.

4. Diagrams associated with the tasks performed

Figure 1 (2 maps) displays the locations of the 1.5 Mile Reach Removal Action Phases including the layout of all excavation cells, permanent maintenance roads and other features.

5. Reports received and prepared

No reports were prepared or received during the month of October 2006.

6. Photo documentation of activities performed

See attached photos.

7. Brief description of work to be performed in November 2006

- Correct drainage problems on Cove Street.
- Complete seeding at Fred Garner Park.
- Complete transfer non-TSCA materials from the stockpile management areas to approved off-site facilities.
- Continue stockpile management activities at Area 64.
- Continue with miscellaneous demobilization activities such as demobilization of Area 64 and decontamination and demobilization of the jersey barriers and the concrete bin blocks.
- Perform minor repairs and maintenance items as needed.

8. ATTACHMENTS TO THIS REPORT

- Table 1. Quantity of non-TSCA Material Transferred to Waste Management of New Hampshire-TREE, Rochester, N.H. during the month of October
- Table 2. Jersey Barriers and Bin Block Concrete Characterization Analytical Results
- Table 3. Equipment Decontamination Confirmation Wipe Sample Results
- Table 4. Backfill Material Testing Results
- Figure 1- 1.5 Mile Removal Action Site Map (2 maps)

Photodocumentation

Table 1 - Quantity of non-TSCA Material Transported to Waste Management of New Hampshire-TREE, Rochester, N.H. During the Month of October October 2006 Monthly Report

GE-Pittsfield/Housatonic River Project 1.5 Mile Removal Action Pittsfield, MA

(Results are reported in tons)

Date Shipped	Doc. Number	Stockpile Area	Net Weight (Tons) (1)
10/03/06	1760WMNH	sub-grade Area 64A south	32.64
10/03/06	1761WMNH	sub-grade Area 64A south	32.60
10/03/06	1762WMNH	sub-grade Area 64A south	31.72
10/03/06	1763WMNH	sub-grade Area 64A south	33.03
10/03/06	1764WMNH	sub-grade Area 64A south	32.32
10/03/06	1765WMNH	sub-grade Area 64A south	31.30
10/03/06	1766WMNH	sub-grade Area 64A south	31.00
10/03/06	1767WMNH	sub-grade Area 64A south	29.69
10/03/06	1768WMNH	sub-grade Area 64A south	32.14
10/03/06	1769WMNH	sub-grade Area 64A south	31.27
10/04/06	1770WMNH	sub-grade Area 64A south	29.54
10/04/06	1771WMNH	sub-grade Area 64A south	30.69
10/04/06	1772WMNH	sub-grade Area 64A south	29.00
10/04/06	1773WMNH	sub-grade Area 64A south	34.05
10/04/06	1774WMNH	sub-grade Area 64A south	30.48
10/04/06	1775WMNH	sub-grade Area 64A south	28.60
10/04/06	1776WMNH	sub-grade Area 64A south	30.39
		Total of Material Disposed	530.46

Notes:

- (1) Net weights established at the disposal facility.
- * Net weights established onsite during the load out of material. Net weights from the disposal facility not yet available.

Table 2 - Jersey Barrier and Bin Block Concrete Characterization Analytical Results October 2006 Monthly Report GE-Pittsfield/Housatonic River Project 1.5 Mile Removal Action Pittsfield, MA

(Results are presented in part per million, ppm)

		Aroclor 1016, 1221, 1232,				
Sample ID	Date Collected	1242, & 1248	Aroclor 1254	Aroclor 1260	Total PCBs	% Solids
H2-OT000428-0-6C05	5-Oct-06	ND(0.034)	0.091	0.28	0.37	97.8%
H2-OT000429-0-6C05	5-Oct-06	ND(0.051)	0.31	0.29	0.6	97.9%
H2-OT000430-0-6C05	5-Oct-06	ND(0.017)	0.06	0.088	0.15	96.7%
H2-OT000431-0-6C05	5-Oct-06	ND(0.017)	0.07	0.12	0.19	97.1%
H2-OT000432-0-6C05	5-Oct-06	ND(0.069)	0.13	0.52	0.65	97.5%
H2-OT000433-0-6C05	5-Oct-06	ND(0.017)	0.034	0.11	0.14	98.1%
H2-OT000434-0-6C05	5-Oct-06	ND(0.017)	0.061	0.18	0.24	97.6%
H2-OT000435-0-6C05	5-Oct-06	ND(0.017)	0.063	0.12	0.18	97.6%
H2-OT000449-0-6C19	19-Oct-06	ND(0.52)	5.6	2.1	7.7*	95.6%
H2-OT000450-0-6C19	19-Oct-06	ND(0.17)	1.5	0.29	1.8*	96.2%
H2-OT000451-0-6C19	19-Oct-06	ND(0.17)	1.2	0.63	1.8*	96.2%
H2-OT000452-0-6C19	19-Oct-06	ND(0.053)	0.26	0.24	0.5	94.0%
H2-OT000453-0-6C19	19-Oct-06	ND(0.018)	0.059	0.12	0.18	95.4%
H2-OT000454-0-6C23	23-Oct-06	ND(0.053)	0.23	0.25	0.48	94.8%
H2-OT000455-0-6C23	23-Oct-06	ND(0.035)	0.11	0.17	0.28	95.3%
H2-OT000456-0-6C23	23-Oct-06	ND(0.018)	0.047 J	0.1	0.15	93.8%
H2-OT000457-0-6C23	23-Oct-06	ND(0.018)	0.027 J	0.041	0.068	94.9%

Notes:

PCB Action Level - 1.0ppm

ND(0.017) - Analyte was not detected. The value in parentheses is the associated detection limit.

J - Indicates an estimated value

ND - not detected

^{* -} Samples represent 30 pieces of bin blocks and jersey barriers that failed the PCB Action Level in September, the bin blocks and jersey barriers were re-decontaminated and more samples were collected. Sample results exceeded the PCB Action Level again, the 30 bin blocks and jersey barriers represented by the samples will be set aside and disposed off appropriately.

Table 3 - Equipment Confirmatory Wipe Samples October 2006 Monthly Report

GE-Pittsfield/Housatonic River Project 1.5 Mile Removal Action Pittsfield, MA

(Results are presented in µg/100 cm²)

Sample ID	Date Collected	Aroclor 1016, 1221, 1232 & 1242		Aroclor 1254	Aroclor 1260	Total PCBs
H2-XI000465-0-6C02	02-Oct-06	ND(0.25)	ND(0.25)	ND(0.25)	ND(0.25)	ND(0.25)
H2-XI000466-0-6C02	02-Oct-06	ND(0.25)	ND(0.25)	ND(0.25)	ND(0.25)	ND(0.25)

Notes:

PCB Action Level - 10.0 µg/100 cm²

ND(0.25) - Analyte was not detected. The value in parentheses is the associated detection limit.

J - Indicates an estimated value

Table 4 - Backfill Material Testing Results October 2006 Monthly Report

GE-Pittsfield/Housatonic River Project 1.5 Mile Removal Action Pittsfield, MA

(Results are presented in part per million, ppm)

Sample ID	H2-OT000412-0-6S01	H2-OT000442-0-6C19	H2-OT000443-0-6C19	H2-OT000444-0-6C19	
Sample type	Topsoil	Topsoil	Topsoil	Topsoil	MCP Wave 2 Method 1
Date Collected	9/1/2006	10/19/2006	10/19/2006	10/19/2006	S-1&GW-1 Standard
Analyte					(lowest) (1)
ANTHRACENE	ND	ND	ND	ND ND	1,000
BENZO(A)ANTHRACENE	ND ND	ND ND	ND ND	ND ND	7
BENZO(A)PYRENE	ND	ND	ND	ND	2
BENZO(B)FLUORANTHENE	0.43	ND	ND	ND	7
BENZO(GHI)PERYLENE	ND	ND	ND	ND	1,000
BENZO(K)FLUORANTHENE	ND	ND	ND	ND	70
C11-C22 AROMATIC EPH	21	14	13	17	200
C19-C36 ALIPHATIC EPH	19	ND	4.6	8.2	2,500
C9-C18 ALIPHATIC EPH	ND	ND	ND	ND	1,000
TOTAL EXTRACTABLE PETROLEUM HYDROCARBONS (EPH)	40	14	17	25	NA
CHRYSENE	0.38	ND	ND	ND	7
FLUORANTHENE	ND	1.3	1.3	1.1	1,000
INDENO(1,2,3-C,D)PYRENE	ND	ND	ND	ND	7
PHENANTHRENE	0.44	0.63	ND	ND	700
PYRENE	0.58	0.62	0.53	0.62	1,000

Notes:

Only detected constituents are summarized

ND - not detected

(1) - Massachusetts Contingency Plan Wave 2 Method 1 S-1&GW-1 Standards (lowest)

Table 4 - Backfill Material Testing Results October 2006 Monthly Report

GE-Pittsfield/Housatonic River Project 1.5 Mile Removal Action Pittsfield, MA

(Results are presented in part per million, ppm)

Sample ID	H2-OT000445-0-6C19	H2-OT000446-0-6C19	H2-OT000447-0-6C19	H2-OT000448-0-6C19	
Sample type	Topsoil	Topsoil	Topsoil	Topsoil	MCP Wave 2 Method
Date Collected	10/19/2006	10/19/2006	10/19/2006	10/19/2006	1 S-1&GW-1 Standard
Analyte					(lowest) (1)
ANTHRACENE	ND	0.44	ND	ND	1,000
BENZO(A)ANTHRACENE	0.58	0.91	0.43	ND	7
BENZO(A)PYRENE	0.58	0.94	0.51	ND	2
BENZO(B)FLUORANTHENE	0.68	0.83	0.50	ND	7
BENZO(GHI)PERYLENE	ND	0.45	ND	ND	1,000
BENZO(K)FLUORANTHENE	0.42	0.88	0.43	ND	70
C11-C22 AROMATIC EPH	15	21	19	16	200
C19-C36 ALIPHATIC EPH	5.6	4.3	8.4	12	2,500
C9-C18 ALIPHATIC EPH	ND	ND	ND	ND	1,000
TOTAL EXTRACTABLE PETROLEUM HYDROCARBONS (EPH)	20	25	27	28	NA
CHRYSENE	0.58	0.9	0.5	ND	7
FLUORANTHENE	1.9	3.0	1.5	0.73	1,000
INDENO(1,2,3-C,D)PYRENE	ND	0.7	ND	ND	7
PHENANTHRENE	0.96	2.0	0.46	ND	700
PYRENE	1.1	2.2	1.1	ND	1,000

Notes:

Only detected constituents are summarized

ND - not detected

(1) - Massachusetts Contingency Plan Wave 2 Method 1 S-1&GW-1 Standards (lowest)



Photograph 1 – Overview of Restored Parcel I9-5-13



Photograph 2 – Re-grading of subgrade on Hathaway Street



Photograph 3 – Installation of Top Course of Pavement on Hathaway Street



Photograph 4- Overview of Newly Planted Trees at Fred Garner Park



Photograph 5- Planting Activities at Fred Garner Park



Photograph 6– Activities associated with installation of Tree Protective Cages on Newly Planted Trees at Fred Garner Park



